

Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

RYAN CHRISTOPHER KANE,

Defendant.

CASE NO. MJ21-334

COMPLAINT for VIOLATION

Title 21, U.S.C.

Sections 841(a)(1) and 841(b)(1)(A)

BEFORE, Brian A. Tsuchida, United States Magistrate Judge, U. S. Courthouse,  
Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT ONE**

**(Possession of Methamphetamine with Intent to Distribute)**

On or about June 7, 2021, in Bothell, in King County, within the Western District  
of Washington, and elsewhere, the Defendant, RYAN CHRISTOPHER KANE, did  
knowingly and intentionally possess, with the intent to distribute, methamphetamine, a  
substance controlled under Title 21, United States Code, Section 812, Schedule II.

1 It is further alleged that the offense involved 500 grams of more of a mixture of  
 2 substance containing a detectable amount of methamphetamine, its salts, isomers, or salts  
 3 of its isomers.

4 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
 5 841(b)(1)(A).

6 And the complainant states that this Complaint is based on the following  
 7 information:

8 I, Matt Eidinger, being first duly sworn on oath, depose and say:

9 **I. INTRODUCTION AND AGENT BACKGROUND**

10 1. I am a “law enforcement officer of the United States” within the meaning of  
 11 Title 18, United States Code, Section 2510(7), who is empowered by law to conduct  
 12 investigations of, and to make arrests for, offenses enumerated in Title 18, United States  
 13 Code, Section 2516. I have been a Special Agent with United States Department of  
 14 Homeland Security, Immigration and Customs Enforcement (“ICE”), Homeland Security  
 15 Investigations (“HSI”) since September 2008. I am presently assigned to a narcotics  
 16 investigations group in Seattle, Washington focusing on narcotics trafficking and money  
 17 laundering in the Western District of Washington. From March 2009 through June 2013,  
 18 I was assigned to the HSI office in Blaine, Washington, where I conducted narcotics and  
 19 money laundering investigations on the Northwest Border. I am cross-designated and  
 20 have the authority to conduct Title 21 investigations and enforcement activities. I  
 21 personally participated in drug trafficking investigations and work closely with other  
 22 agencies, including the Drug Enforcement Administration (“DEA”).

23 2. As a federal law enforcement officer for over eleven years, I have received  
 24 formal training, as well as extensive on the job training, relative to the investigation of  
 25 narcotics trafficking, money laundering, bulk cash smuggling, black market peso  
 26 exchange, transportation, layering, structuring and other techniques used to launder illicit  
 27 proceeds. I have participated in investigations which involved the use of electronic  
 28 surveillance techniques and have been involved in multiple federal wiretap

1 investigations. I have monitored or overheard numerous calls or meetings between  
 2 informants or undercover agents, drug traffickers and money launderers. I have  
 3 investigated offenses involving illicit controlled substances, money laundering, bulk cash  
 4 smuggling, and other crimes that have resulted in arrests, indictments, and convictions.  
 5 While participating in these and other criminal investigations, I have executed search  
 6 warrants at businesses, residences, vehicles and storage facilities. As a result of these  
 7 investigations, I have become familiar with methods and techniques used by narcotics  
 8 traffickers to import and export narcotics within the United States and distribute those  
 9 narcotics within the United States. I have also become familiar with methods and  
 10 techniques used by money launderers and narcotics traffickers to derive, launder, and  
 11 conceal illicit proceeds, and to use these proceeds to promote and facilitate unlawful  
 12 activity. I have participated in undercover operations that involved the collection,  
 13 transportation, exportation and laundering of illicit proceeds derived from the sale of  
 14 narcotics and other items.

15 3. As set forth below, there is probable cause to believe that Defendant,  
 16 RYAN CHRISTOPHER KANE, committed the count alleged above. Since this affidavit  
 17 is being submitted for the limited purpose of establishing probable cause, I have not  
 18 included every fact known concerning this investigation. I have set forth only the facts  
 19 that I believe are essential for a fair determination of probable cause.

## 20 II. SUMMARY OF PROBABLE CAUSE

21 4. In March 2021, HSI Seattle Group 1 received an investigative lead from the  
 22 Australian Border Force (ABF) through the Australian Department of Home Affairs. On  
 23 March 2, 2021, ABF at New South Wales Air Cargo seized 39 computer hard drives  
 24 containing crystal methamphetamine from a UPS package with tracking number  
 25 1ZA1129E6712470721 (hereinafter "UPS Package 1"). The approximate seizure weight  
 26 was 4 kilograms. The methamphetamine was concealed within the hollowed-out hard  
 27 drives. The package appeared to have originated from Redmond, WA and was shipped  
 28 internationally through UPS. UPS Package 1 entered the U.S. shipping stream from The

1 UPS Store at 14241 NE Woodinville-Duvall Rd, Woodinville, WA 98072 on February  
2 15, 2021.

3 5. On April 25, 2021, a United States Postal Service (“USPS”) outbound mail  
4 parcel with tracking number CM289180275US (hereinafter “USPS Package 1”) arrived  
5 at the SFO International Mail Facility destined to Australia. USPS Package 1 was  
6 declared as “3.5IN DESKTOP HARDDRIVE” and was referred for inspection by CBPO  
7 Johnny Cheng back in Seattle and held locally by CBPO Benson Soo. The same day,  
8 CBPO Angel Salas and CBPO Wendy Coleman x-rayed the parcel which revealed  
9 inconsistencies between the description and the image. In the image, the inside of the  
10 hard drives appeared granular, as if they were full of thousands of small particles. This is  
11 in stark contrast to a smooth solid piece of metal or plastic seen from a legitimate hard  
12 drive. A physical examination of USPS Package 1 revealed 18 vacuum sealed hard  
13 drives. Furthermore, CBPO Salas opened a hard drive and observed a crystalline  
14 substance inside. CBPO Coleman tested the suspected substance inside the hard drive and  
15 it field-tested positive for methamphetamine. CBPO Salas calculated the gross weight of  
16 the hard drives with the methamphetamine to be 8,096 grams.

17 6. On April 27, 2021, a USPS outbound mail parcel with tracking number  
18 CM289167852US (hereinafter “USPS Package 2”) arrived at the San Francisco  
19 International Mail Facility destined to Australia. The parcel was declared as “3.5IN  
20 DESKTOP HARDDRIVE” and was referred for inspection by CBPO Cheng in Seattle  
21 and held locally by CBP personnel at SFO. On the same day, CBPO Salas x-rayed the  
22 parcel which revealed inconsistencies between the description and the image. In the  
23 image, the inside of the hard drives appeared granular, as if they were full of thousands of  
24 small particles. This is in stark contrast to a smooth solid piece of metal or plastic seen  
25 from a legitimate hard drive. A physical exam revealed 18 vacuum sealed hard drives.  
26 The wrapping and feel of the hard drives were inconsistent with what’s expected of a new  
27 drive. Furthermore, CBPO Salas opened a hard drive and a crystalline substance was  
28 found inside. CBPO Salas conducted a field test on the substance contained inside the

1 hard drive and determined that the substance was methamphetamine. CBPO Salas  
2 determined that the total gross weight of the meth and hard drives was 8,173 grams.

3 7. USPS business records revealed USPS Package 2 was tracked on three  
4 separate dates by IP address 50.106.18.109.<sup>1</sup> In addition, USPS business records showed  
5 USPS Package 1 was tracked on eight separate dates by the exact same IP address.<sup>2</sup> This  
6 IP address is assigned to Zply Fiber, an Internet Service Provider.

7 8. Agents received the records from Zply Fiber, which revealed the  
8 subscriber for this IP address was Ryan KANE at 12618 NE 180<sup>th</sup> ST, Apt EE302  
9 Bothell, WA 98011.

10 9. On June 7, 2021, agents executed a federal search warrant, for KANE's  
11 apartment at 12618 NE 180<sup>th</sup> Street, Apt EE302, Bothell, WA 98011, as well as his  
12 vehicle and person. Inside a bedroom in KANE's apartment agents recovered a large  
13 glass container that contained a crystalline substance that field tested positive for  
14 methamphetamine. The total weight of the methamphetamine when it was taken out of  
15 the container was 1,844.1 grams.

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<sup>1</sup> The IP address tracked this parcel on April 23<sup>rd</sup>, April 27<sup>th</sup>, and April 28<sup>th</sup>.

28 <sup>2</sup> The IP address tracked this parcel on April 23<sup>rd</sup>, April 27<sup>th</sup>, April 28<sup>th</sup>, April 29<sup>th</sup>, May 3<sup>rd</sup>, May 4<sup>th</sup>, May 14<sup>th</sup>, and May 18<sup>th</sup>.



Photograph of Methamphetamine Recovered on June 7, 2021

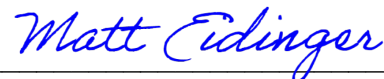
10. Agents also observed that within the same room of the methamphetamine there were approximately 15 hard drives. Agents observed that the hard drives recovered from the room were hollowed-out and contained additional methamphetamine inside of them. The total gross weight for the methamphetamine with the hard drives was 8,280.4 grams. Agents also recovered various packing materials including multiple USPS Priority Mail Express Boxes, FedEx Boxes and envelopes, and multiple shipping labels inside the room. Additionally, agents recovered a loaded 9mm handgun sitting on the couch in the living room of the apartment.

11. During the execution of the warrant agents spoke with KANE, who admitted to knowing that the methamphetamine was in his apartment but stated in

1 substance that he had been extorted into selling the methamphetamine by an outlaw  
2 motorcycle gang. However, the Defendant refused to provide any names of individuals  
3 who had threatened him or supplied the methamphetamine.

### 4 5 **III. CONCLUSION**

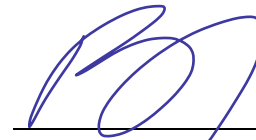
6 12. Based on the above facts, I respectfully submit that there is probable cause  
7 to believe that RYAN CHRISTOPHER KANE did knowingly and intentionally possess  
8 with intent to distribute methamphetamine, and said methamphetamine, its salts, isomers,  
9 or salts of its isomers weighed 500 grams or more, in violation of Title 21, United States  
10 Code, Sections 841(a)(1) and 841(b)(1)(A).

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13 MATT EIDINGER, Complainant  
14 Special Agent, HSI

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16 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
17 presence, the Court hereby finds that there is probable cause to believe the Defendant  
18 committed the offense set forth in the Complaint.

19 Dated this 7<sup>th</sup> day of June, 2021.

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23 BRIAN A. TSUCHIDA  
24 United States Magistrate Judge